

Kiandria Demone Boyce
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Pro Se Defendant
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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

Case No.: 6:25-cv-01272-AA

**Kursten Owen (individually and d/b/a
Elegance & Geekery LLC),**

Plaintiff,

v.

**DEFENDANT KIANDRIA DEMONE
BOYCE'S DECLARATION**

**Breana Askew (individually and d/b/a
Breromi),
Kiandria Demone Boyce,
and Does 1–100,**

**IN SUPPORT OF MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

Defendant(s).

I, Kiandria Demone Boyce, declare as follows:

**DECLARATION OF KIANDRIA DEMONE BOYCE
IN SUPPORT OF MOTION TO DISMISS FOR LACK OF JURISDICTION**

Introduction

I am a Georgia resident and a Defendant in this action. My involvement began when I acted in good faith as an activist, commenting on a viral story that had already gained public attention. My intent was to highlight consumer confusion and to support another individual who appeared to be harmed. Since then, Plaintiff has repeatedly mischaracterized my speech, falsely accused me of threats and harassment, and even sought contempt proceedings against me for unrelated social media posts — proceedings the Court denied. These experiences have created fear, caused significant stress, and harmed my reputation. The burden of defending this case from out of state, without counsel, has already taken a serious toll on my health and well-being, and continuing under these conditions would only worsen that harm.

1. I am a Defendant in this case, *Kursten Owen v. Breana Askew, Kiandria Demone Boyce, and Does 1–100*, Case No. 6:25-cv-01272-AA, pending in the United States District Court for the District of Oregon. I make this declaration in support of my Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or in the Alternative, to Transfer Venue.
2. I reside in Georgia. I have never lived in Oregon, owned property in Oregon, operated a business in Oregon, held bank accounts in Oregon, or employed anyone in Oregon.
3. My online commentary was created in Georgia for a nationwide audience. It arose in response to a viral social media dispute between Plaintiff and co-defendant Breana Askew. I did not target Oregon, direct any communications toward Oregon residents, or instruct others to contact Plaintiff in Oregon.

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4. Plaintiff relies on a LinkedIn screenshot that contained the phrase “Albany, Oregon,” beneath the name of a presumed relative, Caleb Owens, who was listed publicly as a “product developer.” I did not personally search for or retrieve this screenshot; it was sent to me by a third party. At the time, I had no knowledge that Plaintiff lived in Oregon and no reason to research where her business was located. My commentary was not focused on location but rather on the confusion surrounding who actually invented or developed the product. I clearly framed my remarks as speculation and online commentary about a viral social media story, not as factual claims or harassment. A true and correct copy of the screenshot is attached as Exhibit C.
5. Other posts cited by Plaintiff as “harassment” contain no references to Oregon.
6. Plaintiff’s marketing inconsistencies — including the use of another woman’s image in product promotions and conflicting claims about who invented or developed the product — fueled legitimate public confusion. True and correct copies of screenshots reflecting these inconsistencies are attached as Exhibit E.
7. Plaintiff has also publicized details of this case herself by permitting public comments and links to case filings to remain online, which contributed to public attention surrounding the matter. In addition, the social media conversation about Plaintiff and her business was already viral before I ever posted about it. I located posts and commentary from multiple individuals made up to two days before my own commentary. This was a national conversation involving many voices, not something I initiated or directed toward Oregon. True and correct copies of these findings are attached as **Exhibit F**.

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8. Plaintiff previously filed a motion asking the Court to hold me in contempt of court for social media posts unrelated to this case. That motion was denied, and the Court confirmed that my actions did not amount to harassment. Despite this, Plaintiff has repeatedly mischaracterized my speech, falsely accused me of threatening her, and used these accusations to damage my reputation. As a result, I have already been subjected to online bullying by individuals claiming I was being sued for threatening someone, which is untrue.
9. These events have caused me very real fear about how I would be treated in this litigation. That fear did not come from the Court, but from Plaintiff's repeated attempts to portray my online commentary in a false light and to prejudice the proceedings against me by tying unrelated social media activity to this case. The contempt proceedings in particular left me with genuine fear of being jailed for conduct that was lawful and outside the scope of the TRO. I am afraid that the Plaintiff's pattern of mischaracterizing my speech and falsely accusing me of threatening her or violating the TRO will continue. This has left me with ongoing anxiety about the fairness of these proceedings and the impact that repeated false accusations may have on my ability to defend myself. The difficulty I have experienced in locating adequate counsel to represent me in Oregon only exacerbates that fear.
10. I have also experienced a great deal of stress because my involvement in this matter began while I was acting in good faith as an activist, attempting to bring attention to what I believed was consumer confusion and to help another individual who appeared to be harmed. Being sued and falsely accused of threats and harassment, despite my

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intent to speak out in good faith, has been devastating and has magnified the emotional toll of this litigation.

11. This experience has taken a heavy toll on my mental health. I have experienced significant stress, anxiety, difficulty eating, and ongoing worry about defending myself. Being forced to continue defending this matter from out of state, without counsel, will only intensify the negative impact on my mental and physical health and will further impair my ability to effectively defend myself in these proceedings.
12. I have made substantial efforts to retain Oregon counsel, including contacting multiple attorneys and referral services, but have been unable to secure representation. True and correct copies of attorney rejection correspondence are attached as Exhibit A.
13. I attempted to contact Plaintiff's listed pro bono attorney, Erik J. Haynie, but received an automated response indicating that he no longer represents Plaintiff. A true and correct copy of this communication is attached as Exhibit B.
14. Plaintiff has also misused unreliable email-tracking technology, claiming I opened an email I never accessed. A true and correct copy of evidence disproving this claim is attached as Exhibit D.
15. Due Process Concerns - Defending this case from out of state without counsel severely undermines my ability to receive a fair hearing. I cannot afford to travel repeatedly across the country, and I am forced to rely solely on remote technology, which has already proven unreliable (see Exhibit D). These obstacles prevent me from adequately presenting my defense, and I am concerned that continuing to litigate under these conditions would violate my rights to due process and fundamental fairness.

**DECLARATION OF KIANDRIA DEMONE BOYCE
IN SUPPORT OF MOTION TO DISMISS FOR LACK OF JURISDICTION**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 14, 2025 Marietta, Georgia.

/s/ Kiandria Demone Boyce

Kiandria Demone Boyce

Pro Se Defendant

[Contact Information Redacted For Safety Pending Court Approval]

Telephone: [Redacted]

Email: [Redacted]

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